December 12, 2002

Re: Whirlpool Corporation, Evansville Division 163-16557-00022

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

December 12, 2002

Mr. Greg Kissel
Whirlpool Corporation, Evansville Division
5401 U. S. Highway 41 North
Evansville, Indiana 47727

Re: 163-16557
First Significant Permit Modification to
Part 70 No.: T 163-7467-00022

Dear Mr. Kissel:

Whirlpool Corporation, Evansville Division, located 5401 U. S. Highway 41 North, Evansville, Indiana 47727 was issued a Part 70 permit on July 13, 1999 for a plant that manufactures household refrigerators and ice makers. A letter requesting changes to this permit was received on July 2, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support. Document.

The modification consists of incorporating the changes made to the Expanded Polystyrene Production Line, F12 permitted under Significant Source Modification 163-15820:

(a) One (1) Expanded Polystyrene Production Line, identified as F12. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting to stacks F12-1 and F12-2.

The following are the changes made to the Part 70 permit 163-7467, issued on July 13, 1999:

1. Section A.2, item (g) will be changed as follows:

(g) One (1) Expanded Polystyrene Production Line, identified as F12. ~~with a maximum~~. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting ~~to room~~ **to stacks F12-1 and F12-2.**

SECTION D.5 FACILITY OPERATION CONDITIONS

(g) One (1) Expanded Polystyrene Production Line, identified as F12. ~~with a maximum~~. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting ~~to room~~ **to stacks F12-1 and F12-2.**
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to 326 IAC 2-2, Prevention of Significant Deterioration, the shutdown of the Black Parts Paint Booth by the source on October 2000, which reduced the VOC emissions from the source by 131 tons per year shall make the modification from the Expanded Polystyrene Production Line, identified as F12, not subject to the requirements of 326 IAC 2-2, Prevention of Significant Deterioration and 40 CFR 52.21. The shutdown of the Black Parts Paint Booth shall be permanent.

D.5.~~1~~ **2** Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the Expanded Polystyrene Process, identified as F12, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Within 60 days after achieving maximum production rate at which the EPS, F12 will be operated, but not later than 180 days after initial start up of this facility, the owner or operator of this facility shall conduct performance tests to verify the VOC emission factor used in the permit, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping or reporting is required.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Evansville County
Evansville County Health Department
Evansville EPA
Southwest Regional Office
Air Compliance Section Inspector - Scott Anslinger
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

Whirlpool Corporation
5401 U.S. 41 North
Evansville, Indiana 47727

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-7467-00022	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 13, 1999 Expiration Date: July 13, 2004
1st Administrative Amendment 163-11817	Issuance Date: April 27, 2000
2nd Administrative Amendment 163-13859	Issuance Date: March 14, 2001
1st Reopening 163-13511	Issuance Date: February 7, 2002
3rd Administrative Amendment 163-15849	Issuance Date: May 3, 2002
4th Administrative Amendment 163- 15738	Issuance Date: July 2, 2002
First Significant Permit Modification 163-16557	Pages Amended: 7, 38
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 12, 2002

thousand pounds per hour (11,000 lb/hr) of raw material, and exhausting to stack S1-1.

(g) One (1) Expanded Polystyrene Production Line, identified as F12. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting to stacks F12-1 and F12-2.

(h) One (1) Foam-in-Place (FIP) Line No. 4, designated as Emission unit (EU-15), that will be utilized for variety of refrigerator models. This line is a closed-pour system where wet foam is injected through holes in the fully fabricated door panel;

(i) Three (3) electric pre-heat ovens, associated with the FIP Line No. 4; one rated at 13 kilowatts (KW), one rated at 19KW; and one rated at 24 KW. The preheaters are used to warm the steel refrigerator, freezer doors and plastic liners; and

(j) Two (2) closed and slightly pressurized chemical day tanks, associated with the FIP Line No. 4; one 150 gallon tank holding the polyol and blowing agent (HCFC-141b) master batch mixture and one 150 gallon tank holding the isocyanate compound (MDI).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) Natural Gas-fired Boiler less than ten million British thermal units per hour (1.527 MMBtu/hr).

(b) Research and development activities, as defined in 326 IAC 2-7-1(21)(E).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(g) One (1) Expanded Polystyrene Production Line, identified as F12. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting to stacks F12-1 and F12-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to 326 IAC 2-2, Prevention of Significant Deterioration, the shutdown of the Black Parts Paint Booth by the source on October 2000, which reduced the VOC emissions from the modification by 131 tons per year shall make the modification from the Expanded Polystyrene Production Line, identified as F12, not subject to the requirements of 326 IAC 2-2, Prevention of Significant Deterioration and 40 CFR 52.21. The shutdown of the Black Parts Paint Booth shall be permanent.

D.5.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the Expanded Polystyrene Process, identified as F12, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate at which the EPS, F12 will be operated, but not later than 180 days after initial start up of this facility, the owner or operator of this facility shall conduct performance tests to verify the VOC emission factor used in the permit, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing of the Part 70 permit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping or reporting is required.

Indiana Department of Environmental Management
Office of Air Quality
and Evansville EPA

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	Whirlpool Corporation, Evansville Division
Source Location:	5401 U.S. Highway 41 North, Evansville, Indiana 47727
County:	Vanderburgh
SIC Code:	3632 and 3585
Operation Permit No.:	T163-7467-00022
Operation Permit Issuance Date:	July 13, 1999
Significant Source Modification No.:	163-15820
Significant Permit Modification No.:	163-16557
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Whirlpool Corporation, Evansville Division relating to the following emission units used in the manufacture of household refrigerators and ice makers:

(a) One (1) Expanded Polystyrene Production Line, identified as F12. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting to stacks F12-1 and F12-2.

History

On July 2, 2002, Whirlpool Corporation, Evansville Division submitted an application to the OAQ requesting to increase the capacity of the existing permitted production line F-12, from 14,000 pounds of beads per day to 42,000 pounds of beads per day. Whirlpool Corporation, Evansville Division was issued a Part 70 permit (T163-7467-00022) on July 13 1999.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) First Administrative Amendment 163-11817, issued on April 27, 2000;

(b) Second Administrative Amendment 163-13859, issued on March 14, 2001;

(c) First Reopening 163-13511, issued on February 7, 2002;

(d) Third Administrative Amendment 163-15849, issued on May 3, 2002; and

(e) Fourth Administrative Amendment 163-15738, issued on July 2, 2002.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
F12-1a, b, c	Pre-expander	11.5	1.33 x 1.33	4,300	ambient
F12-2	Expanded polystyrene process	30	3 x 3	7,500	ambient
F12-3	Expanded polystyrene process	17.5	0.5	N/A	200-220
F12-4a, b	Expanded polystyrene process	26	0.17	N/A	200-220
F12-4c, d, e	Expanded polystyrene process	26	0.5	N/A	200-220
F-12-4f	Expanded polystyrene process	26	0.83	N/A	200-220

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 2, 2002, with additional information received on August 28, 2002 and via e-mail on September 9, 2002.

Emission Calculations

(a) EPS Production Line F12 Emissions:

Line F12 was originally built in the late 40's and early 50's, with a capacity of 12,000 pounds per day. In the year 2000 it was permitted in SSM 163-11657 to increase its capacity to 14,000 lbs/day with a PTE of 31 tons of VOC/year (Future potential of 36.9 tons/yr - past actual of 5.87 tons/yr = 31 tons/year). The average 2-year 1998 & 1999) actual emissions used as a baseline for this modification was 5.87 tons/year.

Since the modification for this line, F12 done in the year 2000 was not limited to avoid PSD review, then this proposed modification for the same line will not violate 326 IAC 2-2 and 40 CFR 52.21. Also, there is no guidance that allows aggregation of past allowable emissions for the same modified emission unit to trigger 326 IAC 2-2 and 40 CFR 52.21.

Now, this line F12 is being proposed to increase its capacity to 42,000 lbs/day.

Proposed Capacity: - 42,000 pounds per day
Pentane Content in the Bead - 3.9 %
Emission Factor - 0.01716 lb VOC/lb raw bead processed
Emission factor was based on the manufacturer's (BASF) testing.

Potential VOC Emissions	=	42,000 lbs/day * 365 days/yr * 0.01716 lb VOC/lb bead * ton/2000 lb
	=	131.5 tons/year
EPS Bead Throughput in year 2000	-	1,620,620 pounds
EPS Bead throughput in year 2001	-	2,862,851 pounds
2-year Average Throughput		2,241,736 lbs
2-year Average VOC Emission	=	2,241,736 lbs/yr * 0.01716 lb/lb * ton/2000 lb
	=	19.23 tons/year

The increase in the proposed modification of EPS, F12 can be most simply represented by the difference in the new VOC potential to emit (PTE) and the actual VOC emission baseline used in the April 2000 modification.

VOC Emissions Increase Due to Modification	=	131.5 tons/yr - 5.87 tons/yr
	=	125.63 tons/year

or

VOC Emissions Increase Due to Modification	=	131.5 tons/yr - 19.23 tons/yr + 19.23 tons/yr - 5.87 ton/year
	=	125.63 tons/year

Since the modification is major (>40 tons/year), evaluation of the 5-year contemporaneous emissions increases and decreases will be made. **Contemporaneous emission changes (increases and decreases) are based on actual emissions as stated in the New Source Review Manual Chapter III.B.2**:

Contemporaneous Period - July 1997 through November 2002

The only VOC emission changes at the Whirlpool facility that are contemporaneous are the April 2000 modification of the same EPS production line F12 permitted in SSM 163-11657 and the shutdown of the Black Parts Paint System.

April 2000 modification:
The increase in emissions from the April 2000 modification is already counted or represented by using the 5.87 tons of VOC per year as the baseline actual emission, instead of the most recent two year (2000 & 2001) actual emission of 19.23 tons per year. The 5.78 tons/year was the baseline actual emission used in the April 2000 modification.

Shutdown of the Black Parts Paint System:
Shutdown of Black Parts Paint Booth in October 2000 - 131.0 tons/yr (actual emission)

The shutdown of the Black Parts Paint Booth in October 2000 and removal in 2001 was made enforceable in Part 70 Administrative Amendment 163-15849-00022, issued on May 3, 2002. The 131 tons of VOC emission from the shutdown of this booth was calculated based on actual historic production records and annual emission reports, Whirlpool filed with IDEM. Whirlpool reported 132 tons of VOC for year 1999 and 130 tons for year 2000. The 2-year average is 131 tons of VOC per year. This paint booth was constructed by the previous owner, International Harvester in the late 40's through the early 50's, which predated December 6, 1968, the construction permitting requirement date.

Modification Net VOC Emission Increase	=	125.63 tons/yr - 131 tons/yr
	=	- 5.37 tons/yr

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	131.5
CO	0.0
NO_x	00.0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification, 326 IAC 2-7-10.5(f)(4), since the volatile organic compounds (VOC) potential to emit is greater than 25 tons per year.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Vanderburgh County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions taken from the Airs Facility Subsystem Quicklook Report, dated January 22, 1999, including information from PSD/Significant Source Modification 163-12457-00022):

Pollutant	Emissions (tons/year)
PM	0.50
PM-10	14.9
SO_2	74.6
VOC	619.7
CO	11.7
NOx	40.2
Ozone Depleting Substance (ODS)	55.78

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X
Proposed Modification	0.0	0.0	0.0	125.63	0.0	0.0
Contemporaneous Increases	0.0	0.0	0.0	0.0	0.0	0.0
Contemporaneous Decreases	0.0	0.0	0.0	-131.0	0.0	0.0
Net Emission Increase	0.0	0.0	0.0	- 5.37	0.0	0.0
PSD Significant Levels	25	15	40.0	40.0	40.0	40.0

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60):
There are no New Source Performance Standards (NSPS) applicable to this proposed modification.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63):
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this proposed modification.

State Rule Applicability - **Entire Source**

(a) 326 IAC 5-1 (Opacity)
Pursuant to 326 IAC 5-1 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - **Expanded Polystyrene Production Line, F12**

(a) 326 IAC 2-2 (Prevention of Significant Deterioration)
The proposed modification is not a major modification under PSD, as the net VOC emission increase of -18.73 tons/year is less than 40 tons per year.

(b) 326 IAC 8-1-6 (General Reduction Requirements)
This rule is applicable to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year, located anywhere in the state, which are not otherwise regulated by other provisions of article 326 IAC 8.

The Expanded Polystyrene Production Line, F12 which has a new potential VOC emissions of 131.5 tons per year due to increase in capacity is not subject to 326 IAC 8-1-6, as it was originally constructed in the late 1940's to the early 1950's.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) A compliance testing will be required to verify the emission factor used in the calculations. The tests will include every process step involves in the foam expansion process.

Changes to the Part 70 Permit

The following are the changes made to the Part 70 Permit (changes are **bolded** and deletions are ~~struck-through~~ for emphasis):

1. Section A.2, item (g) will be changed as follows:

(g) One (1) Expanded Polystyrene Production Line, identified as F12. ~~with a maximum~~. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting ~~to room~~ **to stacks F12-1 and F12-2.**

SECTION D.5 FACILITY OPERATION CONDITIONS

(g) One (1) Expanded Polystyrene Production Line, identified as F12. ~~with a maximum~~. The maximum foam bead usage will be increased from 14,000 pounds of beads per day to 42,000 pounds of beads per day of raw material, and exhausting ~~to room~~ **to stacks F12-1 and F12-2.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to 326 IAC 2-2, Prevention of Significant Deterioration, the shutdown of the Black Parts Paint Booth by the source on October 2000, which reduced the VOC emissions from the source by 131 tons per year shall make the modification from the Expanded Polystyrene Production Line, identified as F12, not subject to the requirements of 326 IAC 2-2, Prevention of Significant Deterioration and 40 CFR 52.21. The shutdown of the Black Parts Paint Booth shall be permanent.

D.5.~~1~~ **2** Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the Expanded Polystyrene Process, identified as F12, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Within 60 days after achieving maximum production rate at which the EPS, F12 will be operated, but not later than 180 days after initial start up of this facility, the owner or operator of this facility shall conduct performance tests to verify the VOC emission factor used in the permit, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping or reporting is required.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 **Significant Source Modification No. 163-15820-00022, and Significant Permit Modification 163-16557.**